

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Amendment of Part 2 of the Commission's)	
Rules to Allocate Spectrum Below 3 GHz for)	
Mobile and Fixed Services to Support the)	CC Docket No. 00-258
Introduction of New Advanced Wireless)	
Services, Including Third Generation Wireless)	
Systems)	

To: The Commission

**REPLY COMMENTS OF
INVENTEL**

INVENTEL hereby submits reply comments in response to the Commission's Memorandum Opinion and Order and the Further Notice of Proposed Rulemaking (MO&O and FNPRM) that examines additional spectrum band options to support advanced wireless services.

INVENTEL provides its expertise in the development of wireless communication terminals to other industrials but also manufactures wireless communication terminals. Its known-how covers product specification , electronic and software development and industrialization up to mass production. Inventel wireless solutions are based on new technologies such as DECT, Bluetooth and 802.11.

After reviewing the comments of other parties in this proceeding, we notice that – among other things - some parties recommend to retain the 1910-1930 MHz band for isochronous and advanced services and some parties suggest to reallocate the 1910-1930 MHz band or parts of this band either for mobile services or for MDS.

Inventel supports comments in favor to keep the current isochronous UPCS band because it is the only band suitable for interference free cordless voice services. The current “listen before transmitting” rules are the only acceptable to keep good voice quality, compared with high levels of interference in the ISM bands.

Inventel proposes to remove the current 1910-1920 band dedicated to unused asynchronous U-PCS, and to extend the isochronous U-PCS band to 1910-1930MHz. The numerous cordless voice or multimedia services need more channels in order to keep good levels of quality.

All these services currently use the crowded and unprotected ISM bands, with more and more difficulties to achieve acceptable levels of quality. They will take a great advantage in extending the UPCS band.

Inventel supports the comments for permission to use the 1910-1030 band to IMT2000 TDMA/FDMA radio interface, already in function in Europe and several countries (DECT). The basic rules of DECT are quite similar to the current UPCS rules : dynamic channel allocation, spectrum sense before transmission. Because of that, no coexistence problems are expected with current UPCS products in USA.

For that purpose, the current UPCS rules should be slightly modified in order to match with IMT2000 rules : 1.728MHz channel spacing from 1912.896MHz to 1928.448MHz (10 channels) and increase maximum transmitted power to 250mW in order to achieve very good range for high quality cordless phones (typically 100m indoor and 500m in line of sight).

The increasing number of digital standards existing in the states throws users into confusion. It leads to absurd beliefs where people would think products using 5GHz band are working better. In Europe, DECT is a technical and commercial success because this band is available and reserved. There is therefore a real interest in having this band reserved in the US.

Respectfully submitted
Allard-Saint-Albin Nicolas
nicolas.allard@inventel.fr
INVENTEL
35 rue Tournefort
75005 Paris
France.

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